

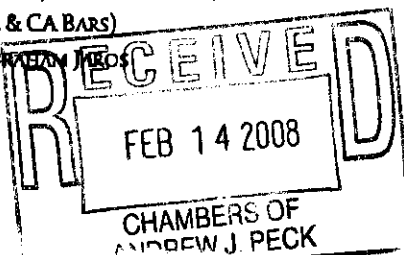
LAW OFFICES OF

JAROSLAWICZ & JAROS, LLC

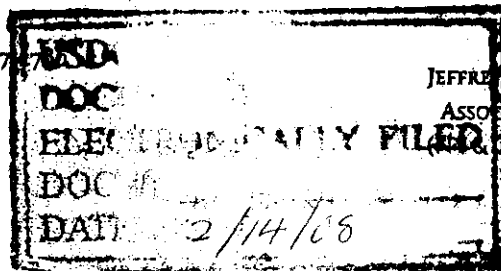
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DAVID JAROSLAWICZ (NY,
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ABRAHAM JAROS



(212) 227-1414



February 13, 2008

BY FAX ONLY: 212-805-7933

Hon. Andrew J. Peck

United States Magistrate Judge

United States District Court, Southern District of New York

Daniel Patrick Moynihan United States Courthouse

500 Pearl Street, Room 1370

New York, New York 10007

MEMO ENDORSED -P

Re: *Kara O'Grady v. Pamela Butler, Tiffany Butler, et al.*

S.D.N.Y. Docket no. 07 CV 8207 (VM) (AJP)

Dear Magistrate Judge Peck,

We represent the plaintiff in the above referenced action has been referred to Your Honor for all pretrial purposes.

Plaintiff was a blameless passenger in a taxi cab which was involved in an intersection accident, and maintains this action against the drivers of the taxi and the other car.

Due to scheduling difficulties that have arisen, we are writing to request 30 day extension of each of the dates in the December 20, 2007 Scheduling Order.

As it stands now, plaintiff's expert reports must be served by February 28, defendants' expert reports are to be served by April 11; all fact and expert discovery must be completed by April 25, and parties are to notify the Court by April 29 as to whether they intend to move for summary judgment. Summary judgment motions are due by May 19.

JAROSLAWICZ & JAROS, LLC

February 14, 2008

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Plaintiff proposes that the schedule be adjusted so that that her expert reports will be served by March 28; defendants' reports will be served by May 12; all fact and expert discovery will be completed by May 26; and the parties will notify the Court by May 29 as to whether they intend to move for summary judgment, with all summary judgment motions to be filed by June 19.

As of this request, the depositions of the plaintiff and defendant Pal Mandeep have taken place. Plaintiff has been unable to obtain her expert reports due to difficulty in the experts' and plaintiff's schedules.

There have been no prior extension requests. Defense counsel Marjorie Bournes, Esq. has consented to this request. Unfortunately, defense counsel Mary Ellen David, Esq. of Martin Fallon & Mulle would neither consent nor state a basis for her refusal.

Respectfully yours,


Jeffrey L. Koenig

MEMO ENDORSED

cc. By Fax: 631-421-5439
Mary Ellen David, Esq.
MARTIN, FALLON & MULLE
100 East Carver Street
Huntington, New York 11743

Attorneys for defendants Pamela and Tiffany Butler

By Fax: 212-857-8210
MARJORIE E. BORNES, ESQ.
330 West 34th Street
New York, New York 10001

Attorneys for defendants Singh Gurbinder and Pal Mandeep

1. Mary Ellen David, Esq. 2/14/08
2/5/08 11:50am report due
JLB, due 4/15.
2. SJ roles due 2/16. SJ
not 01/10 due 2/19 (arranged)
3. Further discovery
strongly urged.

SO ORDERED:


Hon. Andrew Jay Peck
United States Magistrate Judge

any for: Pal Mandeep
BY FAX

FAX TRANSMITTAL SHEET



**ANDREW J. PECK
UNITED STATES MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT**

Southern District of New York
United States Courthouse
500 Pearl Street, Room 1370
New York, N.Y. 10007-1312

Fax No.: (212) 805-7933
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Dated: February 14, 2008

Total Number of Pages: 3

TO	FAX NUMBER
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Mary Ellen David, Esq.	516-421-5439
Marjorie E. Bornes, Esq.	212-857-8210

TRANSCRIPTION:

MEMO ENDORSED 2/14/08

- 1. Discovery cutoff extended to 5/2. Pltf. expert report due 3/13, def. due 4/25.**
- 2. SJ notice due 5/6. SJ motion or PTO due 5/19 (unchanged).**
- 3. Further extensions are extremely unlikely.**